USER GUIDE
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CALENDAR YEAR 2005
HAZARDOUS WASTE POLLUTION PREVENTION
ANNUAL DATA SUMMARY (HW P2ADS) GUIDE

Environmental Information Systems Branch

December 2005

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14. ABSTRACT

The purpose of this guide is to assist Navy and Marine Corps shore installations, CONUS AND OCONUS, in preparing their Pollution Prevention Annual Data Summary (P2ADS). The P2ADS collects hazardous waste for reporting is required by OPNAVINST 5090.1B.

15. SUBJECT TERMS

Hazardous waste, Measures of Merit (MOM), recycling, disposal, and transferred offsite.

16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT	18. NUMBER OF PAGES	19a. NAME OF RESPONSIBLE PERSON
a. REPORT	b. ABSTRACT	c. THIS PAGE			Estella Rosario
U	U	U	UL	41	19b. TELEPHONE NUMBER *(include area code)* (805) 982-4807

EXECUTIVE SUMMARY

The purpose of this guide is to help you prepare your Hazardous Waste Pollution Prevention Annual Data Summary (HW P2ADS) for Calendar Year 2005. Installations that generate more than 100 kg (220 pounds) of hazardous waste per month must submit a HW P2ADS report to NFESC **by 16 March 2006.** Be sure to use the current year software, "CY05 Hazardous Waste P2ADS Software," available for download from our website at: http://enviro.nfesc.navy.mil/ps/datamanagement/main.htm#Download. Marine Corps installations must also provide a copy of the HW P2ADS report to CMC (LF), as required by MCO P5090.2A.

HW P2ADS tracks the Department of the Navy's progress toward meeting the DOD Pollution Prevention and Compliance Program goals as measured by the DOD Hazardous Waste Metrics. Data are collected from installations worldwide as required by OPNAVINST 5090.1B and MCO P5090.2A. The data are presented in a brief to the Deputy Under Secretary of Defense for Environment during the annual Environment, Safety and Occupational Health Management Review, and are further reported in the *Defense Environmental Quality Annual Report to Congress*.

The following new metrics, issued per ODUSD memo of 12 October 2004, are in effect for Calendar Year 2005:

> *Goal*
> *1. Efficiently manage hazardous waste in order to minimize life-cycle costs and future liabilities, protect environmental resources, and enhance operational flexibility.*
> *2. Promote efficient investments in pollution prevention to reduce the quantity of hazardous waste, protect strategic environmental resources, and ensure mission sustainability.*

> *Metric*
> *1. Hazardous waste shipped off-site.*
> *2. Hazardous waste treated on-site.*
> *3. Annual cost of hazardous waste management.*

These metrics cover all Navy/Marine Corps hazardous wastes generated within the host installation's fenceline, including remediation wastes from CERCLA cleanup and RCRA corrective actions and specific new categories of conventional and chemical munitions waste. Universal wastes and polychlorinated biphenyl (PCB) wastes are now reportable, as well. The new and revised Navy Source Codes for HW P2ADS reporting are described in Section 1.4, Reporting Changes for CY05, and are included in the complete listing in Section 3.5, EPA and Navy Source Codes.

Please note under the new CY05 metric Government-owned, Contractor-operated (GOCO) installations that manifest hazardous waste offsite for disposal, or that treat hazardous waste onsite, must also report.

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1. INTRODUCTION

1.1 PURPOSE AND SCOPE. OPNAVINST 5090.1B and MCO P5090.2A require Navy and Marine Corps shore activities, worldwide, to report hazardous waste data. This guide contains reporting instructions to assist you in preparing your Calendar Year 2005 Hazardous Waste Pollution Prevention Annual Data Summary (HW P2ADS).

The HW P2ADS tracks the Department of the Navy's progress toward meeting the DOD Hazardous Waste Pollution Prevention and Compliance Program goals as measured by the DOD Hazardous Waste Metrics:

> *Goal*
>   1. *Efficiently manage hazardous waste in order to minimize life-cycle costs and future liabilities, protect environmental resources, and enhance operational flexibility.*
>   2. *Promote efficient investments in pollution prevention to reduce the quantity of hazardous waste, protect strategic environmental resources, and ensure mission sustainability.*

> *Metric*
>   1. *Hazardous waste shipped off-site.*
>   2. *Hazardous waste treated on-site.*
>   3. *Annual cost of hazardous waste management.*

The Naval Facilities Engineering Service Center (NFESC) collects HW data by installation and provides it for review to Marine Corps and Navy resource sponsors. A final report is provided to the Chief of Naval Operations and Commandant of the Marine Corps. The data are then presented in a brief to the Deputy Under Secretary of Defense for Environment during the annual Environment, Safety and Occupational Health Management Review, and are further used in the *Defense Environmental Quality Annual Report to Congress*.

1.2 WHEN IS IT DUE? The Calendar Year 2005 HW P2ADS, covering the period 1 January– 31 December 2005, must be **received at NFESC no later than 16 March 2006.** Marine Corps installations are also required to provide a copy to Commandant of the Marine Corps (LF).

1.3 WHO MUST REPORT? Installations that generate an average of 100 kg (220 pounds) or more of hazardous waste per month (i.e., 2,640 pounds per year), or 1 kg (2.2 pounds) or more of acute hazardous waste per month, are required to complete the hazardous waste report form provided at the end of this guide. Host installations are expected to report for their tenants. Installations that are conditionally exempt small quantity generators—those that generate less than 100 kg (220 pounds) a month—and whose information is not submitted by a host installation are not required to report. Please refer to Section 3.1.1 for specific instructions.

Installations located in areas that have regionalized or consolidated functions must submit a report for their installation. The regional hazardous waste manager may collect and submit all the reports for the region, but **we must have an individual report for each installation.**

The HW P2ADS reporting requirements apply to naval activities on Air Force and Army installations, as well. Naval activities on Air Force or Army installations shall submit a report to NFESC for inclusion in the Navy totals.

1.4 WHERE DO I REPORT? The CY05 HW P2ADS report may be submitted using either of the two reporting options listed below. We prefer that you e-mail an electronic report created using the P2ADS software described in Option (1).

OPTION (1), P2ADS SOFTWARE REPORTING. E-mail an electronic copy created using the P2ADS software, which is available for download at: http://enviro.nfesc.navy.mil/ps/datamanagement/main.htm#Download. Navy and Marine Corps Intranet (NMCI) users should not experience any difficulty downloading this program since P2ADS is an MS Access database, which is standard on all NMCI computers. After entering all your data into the downloaded software, create your electronic submittal from the *NFESC Report Tab*, as described in Section 2.1.8. The submittal will be an MS Access file with an *.mdb extension. Prior to e-mailing you must change the *.mdb extension to *.bak or *.txt to get the file through e-mail security. **Submit your report** by e-mail to Estella Rosario at estella.rosario@navy.mil.

OPTION (2), PAPER REPORT. Mail or fax a printed copy of the HW P2ADS report to:

COMMANDING OFFICER
NAVAL FACILITIES ENGINEERING SERVICE CENTER
ATTN: ESC 424/ROSARIO
1100 23RD AVENUE
PORT HUENEME CA 93043-4370

FAX your report to: ESC424 at (DSN) 551-4832 or (805) 982-4832. FAXED reports will be accepted as the official report. Please verify that your faxed report has been received by calling NFESC at DSN 551-4807 or (805) 982-4807.

Marine Corps installations must also provide a copy of the HW P2ADS report to CMC (LF), as required by MCO P5090.2A.

1.5 REPORTING CHANGES FOR CY05. To avoid duplicate reporting of treatment, storage, and disposal facility (TSDF) permits we request permit owners, not operators, report the number of permits. Also, open burn/open detonation treatment units that have not received final permit status should be reported as "interim status." Refer to Section 3.2.1, form Part A, Item #5.

Table 1 shows a comparison between last year's source codes and the new metric subcategories and source codes. Per the new DOD metric, naval installations shall include the following new Navy Source Codes in their CY05 HW P2ADS reporting.

    M02   Chem Demil Waste Shipped Offsite
    M03   Conventional Munitions Sent Offsite for Demilitarization
    M04   Conventional and Chemical Munitions Treated Onsite
    PW1   PCB Wastes
    U01   Universal Waste

The new metric also requires remediation waste reporting—use EPA Source Codes G41-49. Navy Source Code M01 shall no longer be used due to overlap with the new munitions categories. Refer to Section 3.5 for a complete list of source codes.

Table 1. New and Revised DOD Metric Subcategories for CY05 vs. CY04		
HW shipped offsite		
HW Subcategory	**CY05**	**CY04**
Remediation waste	*New* subcategory for CY05; use EPA Source Codes G41-49	Remediation waste was not reported in CY04
Chem demil waste	*New* subcategory for CY05; use Navy Source Code M02	Was reportable under Navy Source Code M01; M01 is no longer used due to new metric definitions
Polychlorinated Biphenyl (PCB) wastes	*New* subcategory for CY05; use Navy Source Code PW1	PCB waste was reportable in CY04 only if regulated as HW by your state
Conventional munitions sent offsite for demilitarization	*New* subcategory for CY05; use Navy Source Code M03	Was reportable under Navy Source Code M01; M01 is no longer used due to new metric definitions
Universal wastes	*New* reporting subcategory for CY05; use Navy Source Code U01	Universal waste was Not reported in CY04
HW shipped offsite but NOT included in one of the subcategories above	Continue to report remaining waste by EPA and Navy Source Code	Reportable by EPA and Navy Source Code.
HW Treated Onsite		
HW Subcategory	**CY05**	**CY04**
HW from any part of the lifecycle of **munitions (conventional and chemical) treated onsite**	*New* subcategory for CY05; Navy Source Code M04	Was reportable under Navy Source Code M01; M01 is no longer used due to new metric definitions
HW treated onsite but NOT included in Munitions subcategory above	Continue to report remaining, treated onsite waste by EPA and Navy Source Code	Reportable by EPA and Navy Source Code as treated onsite
Overseas HW Shipped Offsite		
HW Subcategory	**CY05**	**CY04**
Polychlorinated Biphenyl (PCB) wastes	*New* subcategory for CY05; use Navy Source Code PW1	PCBs were reportable if regulated as HW in Final Governing Standards
Remediation wastes	*New* subcategory for CY05; use EPA Source Code G49	Remediation waste was not reported in CY04
HW shipped offsite but NOT included in one of the subcategories above	Continue to report remaining hazardous waste by EPA and Navy Source Code	Reportable by EPA and Navy Source Code

1.6 WHERE TO GET HELP. Contact one of our P2ADS experts listed below:

Estella Rosario	DSN 551-4807	(805) 982-4807	estella.rosario@navy.mil
Michael Nace	DSN 551-3550	(805) 982-3550	michael.nace@navy.mil

1.7 REPORTING CHANGES FOR CY06--Advance Notice. None. We will notify everyone on our Navy and Marine Corps distribution list as soon as we are aware of any data collection changes.

2. CY05 HW P2ADS SOFTWARE

Download the CY05 HW P2ADS software from our web page:
http://enviro.nfesc.navy.mil/ps/datamanagement/main.htm#download.   DO NOT USE LAST
YEAR'S SOFTWARE VERSION. To run CY05 HW P2ADS you must have the following:
Windows 95/98, NT 4.0 workstation, or Windows 2000 Professional; MSAccess 97 or 2000; 32
megs of RAM; and approximately 5 megs of hard disk space.

2.1 SOFTWARE NAVIGATION. [Bold blue italics indicates software feature]
The HW P2ADS opening screen is the *MAIN MENU*. There are three Tabs and two Command
Buttons.
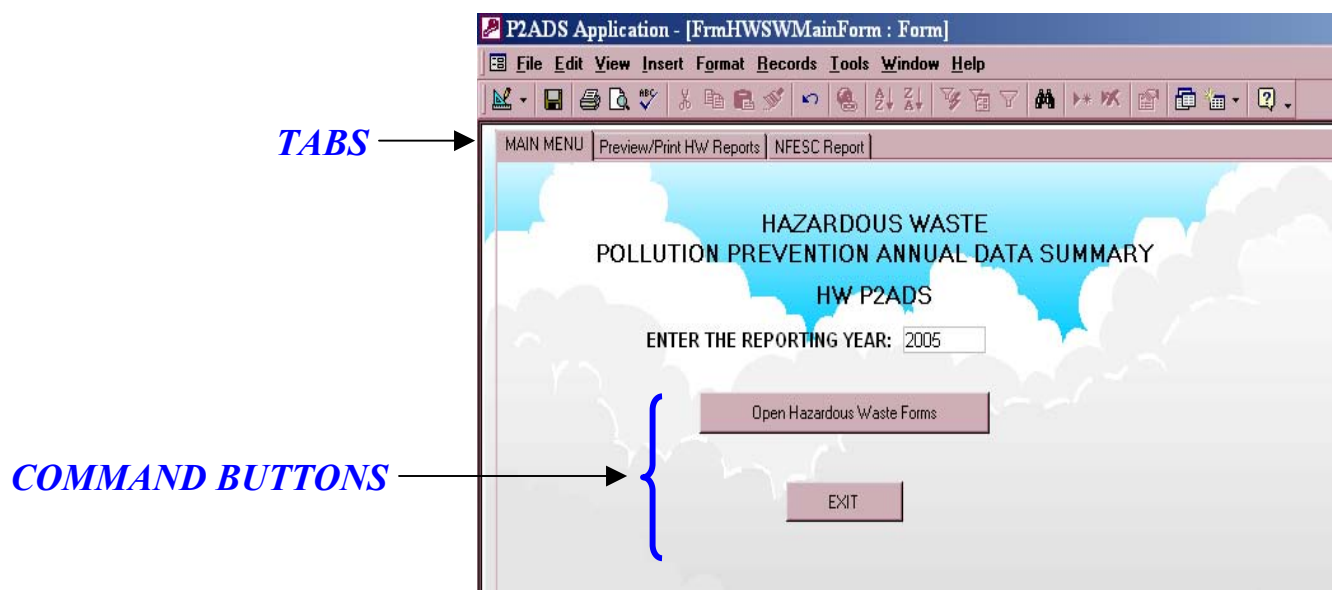
2.1.1 Software Tabs.

MAIN MENU	The initial screen with command buttons to the HW P2ADS form.
Preview/Print HW Reports	Preview and print completed HW P2ADS Part A, Part B, or Part C.
NFESC Report	Creates the P2ADS report MS Access file (e.g., HWP2ADS.mdb) to e-mail to NFESC.

2.1.2 Command Buttons.

Open Hazardous Waste Forms	Selecting this command button will open the form for data entry. Within the form there are multiple tabs (or screens) for data entry. Navigation buttons are located at the bottom of each data entry screen.
Exit	Exits from the P2ADS software.

2.1.3 Navigation Buttons. After completing each data entry screen, click *Save* and select another Tab at the top to move to the next data entry screen, or *Close* to return to the *MAIN MENU*.

First	Moves to the first record in the table.
Previous	Moves to the previous record.
Next	Moves to the next record.
Last	Moves to the last record in the table.
Add	Provides a blank record to add new information.
Delete	Removes the record from the MSAccess table.
Find	Allows you to search for a specific record.
Save	Saves record.
Close	Returns to the *MAIN MENU*.

NAVIGATION BUTTONS

2.1.4 Entering a New Record. Select the installation UIC from the drop down menu. After you have entered the information click *Save*. Select another Tab to move to the next screen, else *Close* to return to the *MAIN MENU*.

2.1.5 Modifying a Record. From the *MAIN MENU* select the *Open Hazardous Waste Forms* button to access the HW P2ADS forms, then use the Tabs to select the screen with the information and field(s) to be modified. Use the tab key or mouse to go to the field and make the changes. **Always use the tab key to exit the modified field and then click *Save* to ensure your modified data is saved.** Select another Tab to move to the next screen, else *Close* to return to the *MAIN MENU*.

2.1.6 Deleting a Record. Records can be deleted from any screen using the *Delete* button. However, to delete a record from the HW POC INFO, HW Operations Summary or HW Success Stories screens you must first delete all related records for that UIC. That is, delete all tenant, operation, and success data before deleting contact information for the selected UIC.

2.1.7 Preview/Print HW Reports. After entering data, a printer friendly copy of the HW Activity Information, HW Operations Summary, and Success Stories may be viewed and printed. From the *MAIN MENU* go to the *PREVIEW/PRINT HW REPORTS Tab* and select a button to preview and print the desired report.

2.1.8 Creating Electronic P2ADS Submittal. From the *MAIN MENU* go to the *NFESC Report Tab*, select the *Create NFESC Report* button to copy all the necessary data to create the NFESC Report file. The data is not deleted from the database.
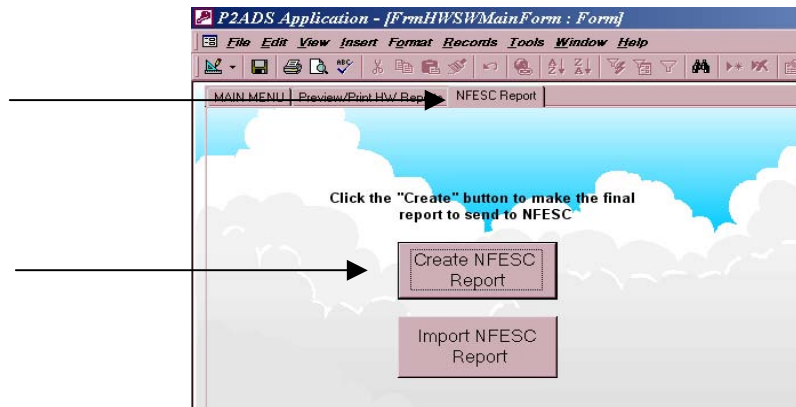
Enter a drive path and file name for your report database in the *Output Database* field. For example: C:\...\HWP2ADS\CY05_N12345.MDB The drive path to save the file in My Documents, for example, on an NMCI desktop is lengthy and therefore not shown.

Select the *Create NFESC Report* button. The software will automatically select all required MS Access tables for copying.
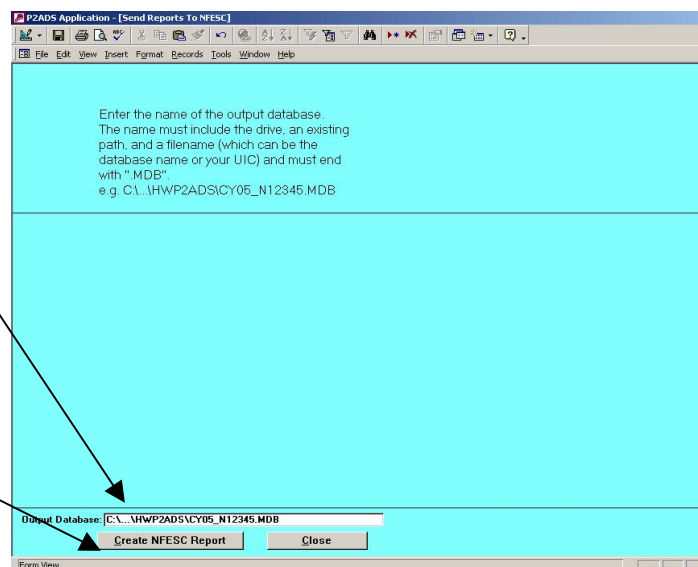
When complete you will see a message such as:
 "The database C:\HWP2ADS\CY05_N12345.MDB has been successfully archived."

Select "OK" and then *Close* to return to the *NFESC Report Tab*. Select the *MAIN MENU Tab* and *Exit*. E-mail the P2ADS Database just created as an attachment to NFESC Hazardous Waste Manager. NOTE that prior to e-mailing you must change the *.mdb extension to *.bak or *.txt to get the file through e-mail security. E-mail your report to Estella Rosario at estella.rosario@navy.mil.

3. COMPLETING THE HW P2ADS REPORT FORM

The following requirements apply to all Navy and Marine Corps installations, including naval activities on Air Force and Army installations.

3.1 GENERAL INSTRUCTIONS. The HW P2ADs report form has three parts:

> PART A: HW Activity Information
> PART B: HW Operations Summary
> PART C: HW Success Stories

Requirements for this report differ from reports for the Environmental Protection Agency (EPA) and state agencies. The intent of this report is to gather data specific to Navy and Marine Corps hazardous waste operations, by installation and major command. This report excludes non-Navy and non-Marine Corps operations and tenants. The host installation must collect and submit report information for all of their Navy and Marine Corps tenants. An example completed report is shown in Section 3.3 and a blank HW P2ADS report form is provided at the end of this guide. A MS Word version of this form may be downloaded from our web site.

Installations located in areas that have regionalized or consolidated functions must submit a report for their installation. The regional hazardous waste manager may collect all the reports for the region, but **we must receive an individual report for each installation.**

3.1.1 <u>Installations That Must Report</u>. For Generator Class definitions see Section 3.1.3.

All Class 1 and 2 generators located in the U.S., its territories and possessions, and overseas must report. Installation reports should include all Navy and Marine Corps tenants who generate hazardous waste. Tenants, including Class 3 tenants, must report to their host installation regardless of who their major command or Budget Submitting Office (BSO) is. The BSO is normally the resource sponsor. For example, a naval aviation depot that is a tenant of a naval station will send their report to the naval station—even though the BSO for the naval aviation depot is the Naval Air Systems Command. The naval station will forward the tenant report and their own report to NFESC. The installation is not required to merge the reports. Installations should not include waste generated by non-Navy or non-Marine Corps tenants, for example: Defense Reutilization and Marketing Office (DRMO), Army detachments, Coast Guard, Air Force, etc.

For hazardous waste offloaded from ships: The receiving shore activity shall include in their report all hazardous waste transferred from a Navy ship, as specified in OPNAVINST 5090.1B, Section 12-5.2.1, under Navy Source Code S01–Ship Operations.

Class 3 generators that are tenants must provide their hazardous waste information to their host installation for inclusion in the host's report. Class 3 generators that are not tenants are not required to report.

Base Realignment and Closure (BRAC) activities are required to report generated hazardous waste, including wastes generated from CERCLA cleanup and RCRA corrective actions per the DOD HW metric beginning CY05.

All Government-owned, Contractor-operated (GOCO) facilities performing work for the Department of the Navy must report. If waste is disposed using the operator's EPA identification number then the GOCO facility is not required to report.

3.1.2 Regional Reporting Requirements. Regionalization is the term used to describe consolidation of several installation functions into a single regional command. This sometimes includes hazardous waste management. When reporting the HW P2ADS data each installation must submit a separate report. The regional hazardous waste manager may submit all reports for their region, but we need a separate HW P2ADS report for each installation in that region. The individual reports are necessary to report the DOD metric performance. Navy and Marine Corps installations that are not part of a region may continue to report as usual.

3.1.3 Generator Class Definitions.

   Class 1, Large Quantity Generator, average monthly generation quantity of 1,000 kg (2,200 pounds) or more hazardous waste, or 1 kg (2.2 pounds) or more acute hazardous waste. This is equal to 26,400 pounds or more hazardous waste, or 26.4 pounds or more acute hazardous waste, per year.

   Class 2, Small Quantity Generator, average monthly generation quantity of 100 to 1,000 kg (220–2,200 pounds) hazardous waste and less than 1 kg (2.2 pounds) acute hazardous waste. This is equal to 2,640–26,400 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

   Class 3, Conditionally Exempt Small Quantity Generator, average monthly generation quantity less than 100 kg (220 pounds) hazardous waste and less than 1 kg (2.2 pounds) acute hazardous waste. This is equal to less than 2,640 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

3.2 HW P2ADS FORM—PARTS A, B, AND C.

From the *MAIN MENU* select the *Open Hazardous Waste Forms* command button. There are four tabs (data entry screens) for completing Parts A, B, and C. The following paragraphs describe the information to be entered in each data entry field. If you need additional space to explain an entry, please use the Comments field on the *HW POC INFO Tab*.

3.2.1 PART A: HW Activity Information.

HW POC INFO Tab

1. <u>INSTALLATION</u>: From the dropdown list, select the host installation name and UIC for which you are reporting. The installation selected will follow through for each of the tabs as you enter

data. Upon selecting a UIC, the installation name, major command/BSO, and COMNAVREG fields will be automatically populated.

If the installation is not in the dropdown list, type in your UIC (six character alphanumeric UIC, with prefix "N" for Navy or "M" for Marine Corps), hit ENTER, and click "yes" in the dialog box to add your installation. Enter the UIC listed in NAVCOMPT Manual Volume 2, Chapter 5. This is also known as a Department of Defense Activity Address Code (DODAAC) and is available from your financial manager or resource manager. Enter the installation name as listed in the Plain Language Address Directory (as used on naval messages).   Enter installation information: UIC, Installation Name, Major Command (i.e, BSO), EFD, and Navy Region, as applicable. Select "OK" when complete.

> **MARCORPS NOTE:** The UIC is not the RUC contained in MCO P1080.20L, Chapter 1.

> **NOTE: ACTIVITIES IN CARETAKER STATUS**—use the installation's former UIC, not the UIC of the Naval Facilities Engineering Command caretaker function.

After completing this screen, click *Save* and select another Tab—Tenants, HW Operations Summary, or HW Success Stories—to move to the next data entry screen.

2. <u>HAZARDOUS WASTE CONTACT</u>. Give the name of the activity's hazardous waste contact. This should be the person who can answer questions regarding your HW P2ADS submittal. Please provide an alternate contact in #9, Comments. Give the organizational code of the contact listed as well. Provide the e-mail address of the HW contact. Provide the telephone number (as dialed from continental U.S.) of the contact and indicate if the number is DSN or

commercial. Also, please give the fax number of the contact and indicate if the number is DSN or commercial. DSN is preferred. Include the DSN country code if outside CONUS.

3. <u>GENERATOR CLASS</u>. Provide the class that indicates the average monthly quantity of hazardous waste that the activity generates. To determine class include all hazardous wastes generated, including those recycled. If your activity is a tenant, your host command will report for you; however, you may be asked to provide information to your host. If your activity is a Class 3 generator, and a stand alone facility (i.e., not a tenant within a larger host fenceline), you are not required to report.

   <u>Class 1</u>, Large Quantity Generator, average monthly generation quantity of 1,000 kg (2,200 pounds) or more hazardous waste or 1 kg (2.2 pounds) or more acute hazardous waste. This is equal to 26,400 pounds or more, or 26.4 pounds or more acute hazardous waste, per year.

   <u>Class 2</u>, Small Quantity Generator, average monthly generation quantity of 100–1,000 kg (220–2,200 pounds) hazardous waste and less than 1 kg (2.2 pounds) acute hazardous waste. This is equal to 2,640–26,400 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

   <u>Class 3</u>, Conditionally Exempt Small Quantity Generator, average monthly generation quantity less than 100 kg hazardous waste and less than 1 kg acute hazardous waste. This is equal to less than 2,640 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

4. <u>EPA IDENTIFICATION NUMBER(S)</u>. List your EPA identification number(s). All Class 1 and 2 generators are required to have an EPA identification number per 40 CFR 262.12 of the federal regulations. This is typically a 12 digit alpha-numeric number beginning with the two letter abbreviation of the state in which your facility is located. This number is entered on HW manifests and is used to track and identify hazardous waste by generator. HW generated by tenant activities is usually disposed under the host installation's EPA identification number, thereby necessitating only one number for all HW generated within the host installation's fenceline.

If you list more than one EPA identification number, please explain the reason for multiple numbers in the #9, Comments by providing the name of the generator associated with each number and the reporting installation's relationship to each generator (e.g., an EPA identification number for a contractor who generates HW while performing work under contract with a SUPSHIP command.)

5. <u>DO YOU HAVE A RCRA TSD OR INTERIM STATUS PERMIT—IF YES, HOW MANY</u>? If you have one or more RCRA TSD permits or an interim status permit enter the quantity.

   <u>RCRA Permit Number(s)</u>: List the RCRA TSD permit number(s) here. If you have an interim status permit then enter "interim status" as the permit number. RCRA permit numbers are issued by the Environmental Protection Agency or an authorized state agency to activities with treatment, storage, and disposal operations. Do not include 90-day storage or permit by rule. NOTE: to avoid double counting, RCRA TSDF permits should be reported by the permit

owner host installation, not the operator.

6. DOES YOUR ACTIVITY HAVE A POLLUTION PREVENTION (P2) PLAN? Enter "yes" or "no." Activities that are included in the P2 plan of a region or host activity should indicate "yes." If yes, provide the date that the plan was last updated.

7. TOTAL HW MANAGEMENT COST. Provide the annual total hazardous waste costs for the calendar year. This cost should include all aspects associated with disposition of hazardous waste, with the exception of in-house labor. The costs should include but are not limited to:

- Costs paid to a contractor, Defense Reutilization Marketing Office, or treatment, storage, or disposal facility
- Storage costs charged to you while awaiting disposal
- Packaging, transport, and disposal costs
- Sampling and lab analysis costs
- Public works center handling fees, etc.

Include hazardous waste disposal costs for CERCLA or RCRA corrective actions only if funded using station operation and maintenance funds (i.e., O&MN or O&MNR funds). Do **NOT** include disposal costs associated with CERCLA cleanup or RCRA corrective action funded with Environmental Restoration, Navy (ERN) funds. Do not include costs to perform Defense Environmental Restoration Act (DERA) studies, such as site inspections or remedial investigations, etc.

The hazardous waste management costs reported here should be equal to or greater than the total costs reported in report form Part B, HW Operations Summary. The Total HW Management Cost includes the total costs from Part B and all other costs related to hazardous waste management, even sampling and analyses costs that result in the waste going to a solid waste landfill rather than a hazardous waste landfill.

8. DOES YOUR INSTALLATION HAVE A CHRIMP PROGRAM, OR HCP FOR MARINE CORPS INSTALLATIONS, THAT INCLUDES ALL TENANTS, UNITS, AND CONTRACTORS, WITH A CENTRALIZED HAZARDOUS MATERIAL CONTROL POINT, CONTROLLING SOFTWARE, MINIMIZED INVENTORIES, AND HAZMAT CONTAINER TRACKING? Enter "yes" or "no." CHRIMP is a methodology to achieve lifecycle hazardous material control and management (HMC&M) and pollution prevention at the command and facility levels. Enter "yes" if installation HAZMAT users are on an installation-wide authorized use list (AUL) and procure their HAZMAT through a HAZMIN center. Refer to the glossary for definitions of CHRIMP and HCP.

9. COMMENTS. Use the comments field to provide additional information not covered by the report or to explain any unusual values or significant changes from your previous year report. Indicate anomalies reported in your hazardous waste operations data, such as reporting a large increase in waste, beyond your normal operations. NOTE: If your report quantities, etc., are significantly different from last year and you don't provide an explanation one of our P2ADS program coordinators will be calling you to obtain this information.

TENANTS Tab

10. <u>TENANT ACTIVITIES</u>. List the name and UIC for all tenant activities that are included in this hazardous waste report. List only tenants that generate hazardous waste. Ship generated hazardous waste is considered generated by the receiving shore activity; therefore, do not list ships as tenants.

3.2.2 PART B: HW Operations Summary.

HW OPERATIONS SUMMARY Tab

The data reported here are all Navy/Marine Corps hazardous wastes generated within the host installation's fenceline. Hazardous wastes reported in this part are those regulated under RCRA and state laws and regulations, or host nation Final Governing Standards. This includes HW from off-loading ships, HW from tenants (including Class 3 tenants), hazardous wastes sent to a public works center or DRMO for management and disposal, and hazardous material designated as hazardous waste after going through the reutilization, transfer, donation, and sales cycle.

Effective CY05 installations are also to report hazardous remediation wastes from CERCLA cleanup and RCRA corrective actions, universal wastes, and PCB wastes.

Do not report oil, asbestos, or asphalt wastes **unless** they are manifested as a hazardous waste or designated as universal waste under state laws or international agreements.

11. <u>ACTIVITY UIC & EPA OR NAVY SOURCE CODE</u>. **If the generating activity is a tenant NADEP**, the reporting host installation must enter the NADEP's UIC in column 1 to identify NADEP wastes and source codes separate from other wastes generated on the installation. If the generating activity is the host or other nonNADEP tenant, entering the UIC in column 1 is optional.

Enter the EPA and Navy Source Codes and show pounds backlogged, stored, recycled onsite, recycled offsite, treated onsite, disposed onsite, disposed offsite, and total cost for each. See Section 3.5 for a complete listing of source codes and descriptions. The source codes are the same as those used in EPA's Hazardous Waste Report (Biennial Report), with the addition of **six Navy-specific source codes for purposes of HW P2ADS reporting.** The Navy Source Codes are:

      M02 Chem demil waste
      M03 Conventional munitions sent offsite for demilitarization
      M04 Conventional and Chemical Munitions Treated Onsite
      PW1 Polychlorinated Biphenyl (PCB) waste
      S01 Ship Operations
      U01 Universal Waste

If you reported "Other Select Wastes" in the FY05 Solid Waste P2ADS that are also manifested as hazardous or regulated as universal waste, report those wastes here as well. The reason for

the double reporting is that Other Select Wastes in the FY05 Solid Waste P2ADS are not regulated as hazardous in all states, but we need ALL manifested hazardous wastes and universal wastes to be reported in the HW P2ADS in accordance with the DOD HW metric.

Activities that have radioactive hazardous waste (mixed waste) should provide the same range of data in the HW P2ADS report as they would provide to EPA or the state in a biennial report. Separate the radioactive mixed waste data from the hazardous waste data to distinguish the difference between the two waste types.

USE POUNDS WHEN REPORTING QUANTITY. Quantities may be reported using the net weight or gross weight of the waste in pounds. Net weight is the weight of the waste without the container. The net weight is used when the container is returned for reuse rather than disposed of with the waste. Gross weight is the weight of the waste and the container when both are disposed.

Quantity Backlogged. Specify the number of pounds of hazardous waste that was generated and in storage *from the previous calendar year*, that was then disposed, treated, or recycled during the reporting calendar year. Backlogged quantities cannot be greater than Stored + Recycled + Treated + Disposed.

Quantity Stored. Specify the number of pounds of hazardous waste stored onsite on 31 December 2005. Quantity stored includes hazardous wastes in temporary collection areas and 90-day accumulation areas that are capped off as full. However, if a waste was manifested

offsite for disposal, but is still in storage at the offsite facility, report that waste as disposed, not stored.

Please note: Do not report the intermediate storage status of wastes treated or disposed before the end of the calendar year, report only the end of year status. For example, if a waste was stored on 31 March and shipped offsite for disposal on 23 May, the HW P2ADS Operations Summary would show a quantity under disposal only, and the storage would not be reported.

Quantity Recycled Onsite. Specify in pounds the quantity of hazardous waste recycled onsite at the reporting activity. The quantity of reusable material should be listed here, while quantity of waste not reused (e.g., sludge), if known, should be listed as disposed.

Quantity Recycled Offsite. Specify in pounds the quantity of hazardous waste recycled offsite; for example, solvents sent off base through a contractor. The quantity of reusable material should be listed here, while the quantity of waste not reused (e.g., sludge), if known, should be listed as disposed.

Quantity Treated Onsite. Specify in pounds the quantity of hazardous waste treated onsite during the calendar year. Treatment methods include neutralization, biological degradation, and thermal treatment such as incineration and open burning/open detonation of ordnance. Include only those hazardous wastes that have been treated to destruction. Do not include wastes that are treated to reduce the hazard and then disposed of as a hazardous waste; rather, report these wastes manifested offsite as disposed offsite. Wastewater that is piped from the generating source to an onsite treatment plant is not reported.

Quantity Disposed Onsite. Specify in pounds the quantity of hazardous waste that was disposed of in a landfill located on the installation during the calendar year.

Quantity Disposed Offsite. Specify in pounds the quantity of hazardous waste that was disposed of offsite, to include treated offsite, during the calendar year. Disposed is the amount of hazardous waste that was manifested offsite for ultimate destruction or land disposal. Items contracted and shipped offsite for disposal should be listed as disposed regardless of the actual status, e.g., in storage at contractor site or DRMO. Waste sent to DRMO should be reported as offsite even if the DRMO is on Navy property. Wastes treated offsite should be reported as disposed offsite.

Total Cost. Indicate the total cost for disposal, treatment, or recycling for each source code and quantity listed. If costs are reported per pound please indicate that on the report. The overall total cost in Part B: HW P2ADS Operations Summary should less than or equal to the Total HW Management Costs reported in Part A, as the Part A total may include hazardous waste management costs not associated with the actual waste disposition, such as contractor costs, analysis costs for wastes determined not to be hazardous, storage costs, etc.

3.2.3 PART C: HW Success Stories.

HW SUCCESS STORIES Tab

13. <u>SUCCESS STORIES</u>. Provide one or more success story summaries. When in doubt as to whether or not you have a success story, just send us a narrative describing significant improvements to your hazardous waste program. Please use the following format to describe your success and limit your submission to 300 words or less (about one page). If you think it's a success story, we do too!

<u>Organization Name</u>. Give the name of the activity.

<u>Contact, Telephone Number, E-Mail Address</u>. Give the name, telephone number, and e-mail address of your activity contact. This should be the person who can answer questions regarding the success story.

<u>Success Story Title</u>. Give a description of the success in reducing or eliminating a hazardous waste.

<u>Economic Benefits</u>. Give a description of any economic benefits derived from eliminating or reducing a hazardous waste**.** Include the following aspects, as appropriate:

- Reduced disposal or treatment costs
- Reduced or eliminated hazardous material purchases
- Recycled materials replaced new purchases
- Dollars received by selling recyclables
- Labor savings
- Utilities savings

The following formula may be used to calculate return on investment (ROI) over a ten-year period:

$$\$\ ROI\ =\ [(Current - New)(10\ yr)] - [One\ Time\ Capital\ Costs]$$

Current = Current annual operating costs, defined as cost to operate and maintain process before new technology or new management practice is initiated. Consider materials purchased, disposal and treatment costs, labor, and utilities.

New = Annual operating and maintenance costs of new technology or new management practice. Consider materials purchased, disposal and treatment costs, labor, and utilities. If you received money from recycling using the new technology or management practice then add this to the ROI.

One Time Capital Costs = Cost for new equipment plus installation costs; include any decommissioning or changeover costs as part of installation.

Include equipment depreciation and other cost factors, if significant, to present a return on investment that is more representative of your situation.

Pollution Prevention and Environmental Benefits. Give a description of pollution prevention or environmental benefits derived from reducing or eliminating a hazardous waste.

Consider the following in your narrative:

- Elimination of a hazardous waste stream
- Compliance issues:
  - Meeting compliance requirements through pollution prevention
  - Eliminating need for permits
  - Meeting further reduction requirements or recycling goals, local or regional goals beyond the DOD metric goals, such as diversion of waste from landfills
- Safety issues:
  - Have you reduced employee exposure to toxic chemicals?
  - Have you eliminated the need for personal protection equipment?
- Time and effort saved

Other Benefits and Comments. Give any benefits other than those listed above and any other comments regarding the success of reducing or eliminating a hazardous waste at your activity.

3.3 EXAMPLE COMPLETED REPORT FORM

PART A: HW ACTIVITY INFORMATION
1 January–31 December 2005

1. **UIC:** _N12345_

    INSTALLATION NAME: _NAVAL STATION SMALL TOWN_

2. **HAZARDOUS WASTE CONTACT:**

    NAME: _SALLY S. SAMPLE_

    CODE: _123_

    TELEPHONE NO. DSN: _555-5555_ **COM:** _(805) 555-5555_

    FAX DSN: _(805) 555-5556_ **COM:** _(805) 555-5555_

    E-MAIL ADDRESS: _sally.sample@navy.mil_

3. **GENERATOR CLASS (1, 2, or 3):** _1_

4. **EPA IDENTIFICATION NUMBER(S):** _A9876543210_

5. **DO YOU HAVE A RCRA TSD OR INTERIM STATUS PERMIT? IF YES, HOW MANY?** _2_

    RCRA Permit Number(s): _A9876543210_ _Interim Status_ _____

6. **DO YOU HAVE A POLLUTION PREVENTION PLAN?**
    Enter "yes" or "no"   YES _X_   NO _____
    If yes, provide the date your P2 plan was last updated: _6 January 2003_

7. **TOTAL HW MANAGEMENT COST:** _$154,000_

8. **DOES YOUR INSTALLATION HAVE A CHRIMP PROGRAM, OR HCP FOR MARINE CORPS INSTALLATIONS, THAT INCLUDES ALL TENANTS, UNITS, AND CONTRACTORS, WITH A CENTRALIZED HAZARDOUS MATERIAL CONTROL POINT, CONTROLLING SOFTWARE, MINIMIZED INVENTORIES, AND CONTAINER TRACKING?**
    Enter "yes" or "no"   YES _X_   NO _____

PART A: HW ACTIVITY INFORMATION (continued)

9. **COMMENTS:** *One RCRA permit for HW storage unit and one for an OB/OD treatment unit. The OB/OD unit will be operated under interim status until the State reviews our permit application.*

10. **LIST MAJOR TENANTS OR OTHER ACTIVITIES COVERED BY THIS REPORT:**
(Please attach continuation sheet if necessary.)

TENANT ACTIVITY NAMES	UIC
AIMD	*N98765*
NAVAL MOBILE CONSTRUCTION BATTALION UNIT 555	*N55588*
NAVHOSP SMALL TOWN	*N11223*
NAVAVNDEPOT SMALL TOWN	*N77889*

PART B: HW OPERATIONS SUMMARY
1 January—31 December 2005

NAME AND UIC OF GENERATOR: N12345 NAVAL STATION Small Town

11. ACTIVITY UIC & EPA OR NAVY SOURCE CODE: The data reported here are all Navy or Marine Corps hazardous wastes, remediation wastes, universal wastes, and PCB wastes generated within the host installation's fenceline. If the generating activity is a tenant NADEP, the reporting host installation must enter the NADEP's UIC in column 1 to identify NADEP wastes and source codes separate from other wastes generated on the installation. If the generating activity is the host or other nonNADEP tenant, entering the UIC in column 1 is optional.

NOTE: Backlogged quantities cannot be greater than Stored + Recycled + Treated + Disposed.

REPORT ALL QUANTITIES IN POUNDS.

ACTIVITY UIC	SOURCE CODES	BACKLOG[1]	STORED[2]	RECYCLE ONSITE	RECYCLE OFFSITE	TREATED ONSITE	DISPOSED ONSITE	DISPOSED OFFSITE	TOTAL COST
N12345	G15	0	0	0	0	0	0	200	1200
N12345	G16	800	750	0	1000	0	0	0	1000
N11223	G16	0	0	0	50	0	0	0	50
N77889	G11	0	0	0	850	0	0	100	1250
N77889	G02	0	0	0	0	500	0	100	750

[1] Backlog pounds stored on 1 January 2005
[2] Stored pounds as of 31 December 2005

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PART C: HW P2ADS SUCCESS STORIES
1 January—31 December 2005

12. HW SUCCESS STORIES:

ORGANIZATION NAME: *NAVAL STATION SMALL TOWN*

CONTACT, TELEPHONE NUMBER, E-MAIL ADDRESS: *Samuel Sample, (805) 555-5557, Samuel.sample@navy.mil*

DESCRIPTION OF THE SUCCESS: *One of the chemical laboratories doubled the scale of a prototype electrochemical plating process as a result of success with the prototype. This modification resulted in the ability to recycle excess metals in the plating solution in subsequent plating operations. Laboratory personnel estimated that a 25% to 50% reduction in metals containing effluent was achieved.*

ECONOMIC BENEFITS: *Reduction in hazardous waste disposal cost of metals containing plating solution and purchase of electroplating metals. Current Cost: The primary cost was disposal at $86.48 per 5-gallons of electroplating waste generated per year. Pay Back: One year pay back based on doubling the size of the process and saving 50% of the effluent disposal cost. One time capital costs not applicable.*

POLLUTION PREVENTION AND ENVIRONMENTAL BENEFITS: *A 50% reduction in effluent production and associated disposal cost of metals containing waste.*

OTHER BENEFITS AND COMMENTS: *The potential for greater savings due to recycling if this electrochemical plating process evolves to production scale.*

E-mail completed hazardous waste information to:

Estella Rosario at estella.rosario@navy.mil or mail your printed HW P2ADS report to:

    COMMANDING OFFICER
    NAVAL FACILITIES ENGINEERING SERVICE CENTER
    ATTN: ESC 424/ROSARIO
    1100 23RD AVENUE
    PORT HUENEME CA 93043-4370

For assistance call NFESC at DSN 551-4807 or (805) 982-4807.

Marine Corps installations are required to provide a copy to CMC (LF). Navy installations must submit a copy to their major command.

3.4 GLOSSARY

Acute HW. Any hazardous waste with an EPA hazardous waste code beginning with the letter "P" or any of the following "F" codes: F020, F021, F022, F023, F026, and F027.

Authorized Use List (AUL). The list of all HM necessary to support the requirements of a command, facility, or activity.

Biennial Report. The Environmental Protection Agency (EPA) requires reports from certain generators of HW and operators of HW treatment, storage, and disposal units. Federal regulations require large quantity HW generators and operators of HW treatment storage and disposal units to submit this report once every two years; thus, it is called the Biennial Report. States may require the report annually and may also require small quantity HW generators to report.

Backlogged. Backlogged refers to a quantity of hazardous waste that was generated and reported as stored on 31 December of the previous calendar year, and is thus "backlogged" on January 1st of the reporting calendar year.

Chem Demil Wastes Shipped Offsite (M02), applicable for new metric in CY05. Hazardous waste resulting from processing chemical agents, precursors, and binary chemical agents; destroyed containers and casings; dunnage; former production facilities; filters; and personal protective equipment. This includes only HW resulting from chemical demilitarization, and <u>not</u> other types of HW generated at the installation.

CHRIMP (Consolidated Hazardous Material Reutilization and Inventory Management Program). CHRIMP is a methodology to achieve lifecycle hazardous material control and management and pollution prevention at the command and facility levels. The CHRIMP Manual, NAVSUP Publication 722, provides a standardized approach and guidance for development and implementation.

Conventional and Chemical Munitions Treated Onsite (M04), applicable for new metric in CY05. Hazardous waste from any part of the lifecycle of munitions (conventional and chemical) treated onsite in a RCRA permitted or interim status unit.

Conventional Munitions Sent Offsite for Demilitarization (M03), applicable for new metric in CY05. Report only those conventional munitions, or components there of, that are considered hazardous waste when sent offsite for purposes of being disposed of, burned, or incinerated, etc.; that is, military munitions that are waste as defined by the Military Munitions Rule at 40 CFR 266 Subpart M. The term includes: confined gaseous, liquid, and solid propellants; explosives; pyrotechnics; riot control agents; smokes; and incendiaries used by DOD components, including bulk explosives, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, and devices and components thereof. It does not include: wholly inert items; improvised explosive devices; or nuclear weapons, devices, and components thereof. Do not report unused munitions or components sent offsite for purposes of

being repaired, reused, recycled, reclaimed, disassembled, reconfigured, or otherwise subjected to materials recovery activities, as such munitions are not waste. Under the DDA process, munitions reclassified from code "H" to code "V" are managed as HW.

Disposed Offsite. Any hazardous waste that is manifested offsite for ultimate destruction. This includes landfilling and thermal treatment.

EPA and Navy Source Codes. Source codes describe the type of process or activity from which a hazardous waste was generated. These are the same source codes used in the EPA Biennial Report, with the addition of six source codes for Navy HW P2ADS reporting: M02– Chem Demil Waste Shipped Offsite; M03–Conventional Munitions Sent Offsite for Demilitarization; M04–Conventional and Chemical Munitions Treated Onsite; PW1– Polychlorinated Biphenyl (PCB) waste; S01–Ship Operations; and U01 Universal Waste Source Codes**.** See Section 3.5 for a complete list and descriptions.

EPA Identification Number.   Sometimes referred to as an EPA ID number, EPA generator number, or generator ID number. Per EPA regulation 40 CFR 262.12, EPA identification numbers, a generator must not treat, store, dispose of, transport, or offer for transportation, hazardous waste without having received an EPA identification number from the EPA Administrator. This is typically a 12 digit alpha-numeric number beginning with the two letter abbreviation of the state in which the facility is located. This number is entered on HW manifests and is used to track and identify hazardous waste by generator.

Final Governing Standards (FGS). FGS is the primary definitive set of criteria and standards applicable to DOD components located overseas at permanent base force structure installations and facilities. The FGS are developed by the DOD designated Executive Agent for the specific country and incorporate provisions of minimum standards established by DOD in the Overseas Environmental Baseline Guidance Document (OEBGD) and those of the host nation. FGS are a set of country-specific environmental standards developed via a comparative analysis of applicable host nation standards with those of the OEBGD. FGS incorporate the "more protective" standard and include appropriate hazardous waste definitions and criteria for all DOD components in a particular host country.

Generator (Generated). For reporting purposes, a generator is defined as an installation or activity that generates or produces hazardous waste in any amount. The term generator has been divided into three classes according to the quantity of HW generated as follows:

Class 1, Large Quantity Generator, average monthly generation quantity of 1,000 kg (2,200 pounds) or more of hazardous waste, or 1 kg (2.2 pounds) or more acute hazardous waste, per month. This is equal to 26,400 pounds hazardous waste or more, or 26.4 pounds or more acute hazardous waste, per year.

Class 2, Small Quantity Generator, average monthly generation quantity of 100-1,000 kg (220-2,200 pounds) of hazardous waste and less than 1 kg (2.2 pounds) of acute hazardous waste. This is equal to 2,640-26,400 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

Class 3, Conditionally Exempt Small Quantity Generator, average monthly generation quantity less than 100 kg (220 pounds) of hazardous waste and less than 1 kg (2.2 pounds) of acute hazardous waste. This is equal to less than 2,640 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

If your activity is a tenant Class 3 generator, your host command will report for you. However, you may be requested to provide hazardous waste information to the host command. If your activity is a Class 3 generator, but not a tenant, you are not required to report.

Hazardous Consolidation Program (HCP). HCP is the Marine Corps program to achieve lifecycle hazardous materials control and management through the application of sound management practices that minimize the types and quantities of hazardous material procured, stored, distributed, and used to accomplish mission requirements at commands and installations.

Hazardous Material (HM). A substance or material that the Secretary of Transportation has determined is capable of posing an unreasonable risk to health, safety, and property when transported in commerce. Hazardous materials are listed in the Hazardous Material Regulations, 49 CFR 171, the Hazardous Material Table, 49 CFR 172.102, and are also listed in the DOT Emergency Response Guide, DOT P5800.

Hazardous Waste (HW). HW is waste listed by the EPA or an authorized state, or that meets the characteristics specified by EPA or an authorized state. A simplification of the federal EPA definition is as follows:

- A waste that is listed as hazardous in RCRA regulations, 40 CFR 261.
- A mixture that includes a listed hazardous waste.
- A waste that exhibits any of the following four characteristics: ignitability, corrosivity, reactivity, or toxicity as defined in RCRA regulations, 40 CFR 261.21-24.

Hazardous Waste Generation Start Date. As defined in 40 CFR 262.34, a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acute hazardous waste at or near any point of generation without marking the container with an accumulation date. However, if you generate more than 55 gallons of hazardous waste or one quart of acute hazardous waste at or near any point of generation, then you must clearly mark the container holding the excess accumulation with the date the excess amount began accumulating. State regulations may vary.

Hazardous Waste Pollution Prevention Annual Data Summary (HW P2ADS). HW P2ADS is an annual summary report that includes information on hazardous waste generation and disposal. The report must be received at the NFESC no later than 16 March for the previous calendar year.

Installation. Installation, as used in this guide, is the host command for several Navy or Marine Corps activities, units, and commands. An installation may have several tenants. A fence normally surrounds the installation. Installations usually provide services to their tenants such as

utilities, security, trash collection, and hazardous waste management and disposal under the host's EPA identification number. Naval Base Ventura County is an installation with tenants such as the Naval Facilities Engineering Service Center, Naval Facilities Institute, etc. Tenants located on host installations of another military service should report through their own component headquarters reporting system. Overseas installations are defined as permanent, base force structure facilities, under the operational control of the secretary of a military department or the Department of Defense, located outside the United States, its territories, or any commonwealth or possession of the United States. Temporary, contingency operation or deployment support facilities located overseas are NOT considered installations for the purposes of HW P2ADS reporting. Tenants on overseas installations should report through their component headquarters reporting systems. NOTE: Beginning in CY05, Government-owned, Contractor-operated (GOCO) installations who meet the generation quantity thresholds for manifesting hazardous waste offsite must report.

Installation Restoration (IR) Program. The IR Program is a comprehensive program to clean up past hazardous waste disposal or spill sites under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

Interim Status. Interim status is the temporary authorization to operate a hazardous waste treatment, storage, or disposal facility (TSDF) while the regulator processes your RCRA permit application. Interim status dates back to when the RCRA permit regulations were first issued. It was used as a means to temporarily allow existing TSDF facilities to continue hazardous waste operations until a final permit to operate could be granted by regulatory authorities. Typically, all Navy installations that require a RCRA permit have been granted a final permit by their regulatory authority, with the exception of a few open burn/open detonation (OB/OD) sites that are still operating under interim status per 40 CFR 265, having never received a final RCRA TSD permit to operate a 40 CFR 264 Subpart X, Miscellaneous Unit.

Manifest. A manifest is the shipping document required to accompany all HW shipments in accordance with 40 CFR 262 of the federal RCRA hazardous waste regulations. Many states use EPA Form 8700-22; however, state variations are not uncommon. The uniform manifest rule will override state manifests when it comes into effect in September 2006.

Offsite. A process or treatment, storage, and disposal facility is considered offsite if the operation is not on Navy property. Note that if the reported hazardous waste is disposed by another command, such as a public works center or DRMO, the disposal location is also considered to be offsite. An example might be where an installation manifests hazardous waste to a public works center and the public works center, in turn, sends the waste to DRMO.

Onsite. A process or treatment, storage, or disposal facility is considered onsite if the operation is on Navy property. This includes the reporting installation or any other contiguous Navy activity.

Overseas. Overseas is defined as outside any territory, possession or commonwealth of the United States. This does not include contingency operations, training deployments, or the operations of military vessels and aircraft.

Polychlorinated Biphenyl (PCB) (PW1), applicable for new metric in CY05. A chemical substance, limited to the biphenyl molecule, that has been chlorinated to varying degrees, or any combination or mixture that contains such substance. PCBs are regulated under the Toxic Substances Control Act (TSCA) and EPA regulations for controlling PCBs, 40 CFR 750-761. NOTE: If the waste is both hazardous and contains PCBs, then report it as hazardous waste, and do NOT include it under PW1.

PCB Wastes. PCB wastes are derived from products containing PCBs. PCB wastes may be regulated under TSCA, RCRA, state programs, or for overseas installations, the applicable FGS.

Quantity. For purposes of this metric, quantity should be measured in pounds. Conversion factors should be consistent with EPA Biennial HW reporting requirements.

RCRA (Resource Conservation and Recovery Act). Public law mandates safe hazardous waste management from the point of generation to ultimate disposal. Federal regulations written by the Environmental Protection Agency to implement this act are in 40 CFR 260-272. Most states are authorized to administer a state HW program in lieu of the EPA's federal program.

RCRA TSD Permits are final or interim status operating permits for facilities that treat, store, or dispose of hazardous waste. The Environmental Protection Agency or authorized state agency issues permits. Do not include 90-day storage or "permit by rule" information.

Recycling. Recycling is a method used to render a hazardous material or hazardous waste reusable, such as distillation or reprocessing. Note that the difference between treatment and recycling is what results from each process–treatment facilitates disposal while recycling allows reuse (see treatment). Regardless, most hazardous materials are hazardous wastes when they are recycled, as specified in 40 CFR 261.2, Definition of Solid Waste. Recycling is a hazardous waste minimization method that may be performed on base, through DRMO, or through a contractor. A recycled waste does not necessarily have to be returned to the generating installation.

Remediation Wastes Shipped Offsite (report by EPA Source Code), new CY05 metric. Remediation wastes shipped offsite are hazardous wastes resulting from CERCLA, RCRA, and state-driven cleanup activities that are also manifested offsite as a RCRA or state-regulated HW. This includes the following EPA Source Codes as defined by EPA's 2001 Biennial Report guidance document: Closure of hazardous waste management unit under RCRA (G41); Corrective action at a solid waste management unit under RCRA (G42); Remedial action or emergency response under Superfund (G43); State program or voluntary cleanup (G44); Underground Storage Tank (UST) cleanup (G45); other remediation (G49). Wastes may be generated from compliance or Installation Restoration Program (IRP) funded clean-up activities. For overseas installations, Remediation Wastes are hazardous wastes as defined in the applicable FGS, generated as a result of cleanup conducted in accordance with DOD Instruction 4715.8, *Environmental Remediation for DOD Activities Overseas*.

Storage (Stored). Storage, as used in Part B of the P2ADS form, refers to hazardous wastes in storage awaiting treatment, recycling, or disposal as of 31 December of the reporting year. An installation may store generated hazardous waste for up to 90 days without a RCRA TSD permit.

Tenant. A tenant is an activity or unit with a separate UIC that occupies space within the geographical boundaries of another activity or installation that acts as host. Tenants usually receive services from the host activity. Examples are a shore intermediate maintenance activity at a naval station, a public works center at a naval station, or a naval aviation depot at a naval air station.

Treatment (Treated). Treatment is a method or process designed to neutralize or render hazardous waste non-hazardous. Report wastes that have been treated onsite to destruction or to a non-hazardous state. Thermal treatment includes ordnance open burn/open detonation (OB/OD) and incineration. Remember that the difference between treating and recycling for the purposes of P2ADS reporting is what results from each process. Treatment facilitates disposal while recycling results in reuse--see recycling. Wastewater treated onsite, where the discharge is regulated under the Clean Water Act, should not be reported.

TSDF (Treatment, Storage, and Disposal Facility). A TSDF is a facility with a RCRA permit to treat, store, or dispose of hazardous waste, regulated under 40 CFR 264 of the federal regulations, or 40 CFR 265 for interim status.

UIC (Unit Identification Code). The UIC is a six character alphanumeric code with a prefix of "N" for Navy or "M" for Marine Corps that may be found in NAVCOMPT Manual Volume 2, Chapter 5. This is also known as a Department of Defense Activity Address Code (DODAAC) and is available from your financial manager or resource manager.

Universal Waste (U01), applicable for new metric in CY05. Universal waste includes any of the following hazardous wastes that are managed under the universal waste requirements of 40 CFR 273:

    (1) Batteries as described in 40 CFR 273.2;
    (2) Pesticides as described in 40 CFR 273.3;
    (3) Thermostats as described in 40 CFR 273.4;
    (4) Lamps as described in 40 CFR 273.5; and
    (5) State-specified universal wastes.

3.5 EPA AND NAVY SOURCE CODES

Wastes from Ongoing Production and Service Processes

G01 – Dip, flush, or spray rinsing
G02 – Stripping and acid or caustic cleaning
G03 – Plating and phosphating
G04 – Etching
G05 – Metal forming and treatment (pickling, heat treating, etc.)
G06 – Painting and coating
G07 – Product and by-product processing
G08 – Removal of spent process liquids or catalysts
G09 – Other production or service-related processes

Other Intermittent Events or Processes

G11 – Discarding off-specification or out-of-date chemicals or products
G12 – Lagoon or sediment dragout and leachate collection
G13 – Cleaning out process equipment
G14 – Removal of tank sludge, sediments or slag
G15 – Process equipment change-out or discontinuation of equipment use
G16 – Oil changes and filter or battery replacement
G19 – Other one-time or intermittent processes

Pollution Control and Waste Management Process Residuals

G21 – Air pollution control devices (baghouse dust, etc.)
G22 – Laboratory analytical wastes (used chemicals)
G23 – Wastewater treatment (sludge, filter cake, etc.)
G24 – Solvent or product distillation or recovery (sludge, waste)
G25 – Hazardous waste management
G26 – Storage and disposal unit leachate collection

Spills and Accidental Releases

G31 – Accidental contamination of products, materials or containers
G32 – Cleanup of spill residues
G33 – Leak collection and floor sweeping
G39 – Other cleanup of current contamination

Remediation of Past Contamination

G41 – Closure of hazardous waste management unit under RCRA
G42 – Corrective action at a solid waste management unit under RCRA
G43 – Remedial action or emergency response under Superfund
G44 – State program or voluntary cleanup
G45 – Underground storage tank cleanup
G49 – Other remediation

Waste Not Physically Generated Onsite

G61 – Hazardous waste received from offsite for storage/bulking and transfer offsite for treatment or disposal

G62 – Hazardous waste received from a foreign country (other than a foreign Department of Defense site, Maquiladora, U.S. territory or protectorate). This site was the generator of record.

Navy Source Codes for P2ADS reporting

M02 – Chem Demil Wastes Shipped Offsite, applicable for new metric in CY05. Hazardous waste resulting from processing chemical agents, precursors, and binary chemical agents; destroyed containers and casings; dunnage; former production facilities; filters; and personal protective equipment. This includes only HW resulting from chemical demilitarization, and <u>not</u> other types of HW generated at the installation.

M03 – Conventional Munitions Sent Offsite for Demilitarization, applicable for new metric in CY05. Report only those conventional munitions, or components thereof, that are considered hazardous waste when sent offsite for purposes of being disposed of, burned, or incinerated, etc.; that is, conventional military munitions that are <u>waste</u> as defined by the Military Munitions Rule, 40 CFR 266 Subpart M. The term includes: confined gaseous, liquid, and solid propellants; explosives; pyrotechnics; riot control agents; smokes; and incendiaries used by DOD components, including bulk explosives, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, and devices and components thereof. It does not include: wholly inert items; improvised explosive devices; or nuclear weapons, devices, and components thereof. <u>Do not report</u> unused munitions or components sent offsite for purposes of being repaired, reused, recycled, reclaimed, disassembled, reconfigured, or otherwise subjected to materials recovery activities, as such munitions are not waste. Under the DDA process munitions reclassified from code "H" to code "V" are managed as HW.

M04 – Conventional and Chemical Munitions Treated Onsite, applicable for new metric in CY05. Hazardous waste from any part of the lifecycle of munitions, conventional and chemical, treated onsite in a RCRA permitted or interim status unit.

PW1 – PCB Wastes. PCB wastes are derived from products containing polychlorinated biphenyls. PCB wastes may be regulated under TSCA, RCRA, state programs, or for overseas installations, the applicable FGS. NOTE: If the waste is both hazardous and contains PCBs, then report it as hazardous waste. Do NOT include it under this source code.

S01 – Ship Operations waste transferred from a ship to a shore installation. Hazardous waste generated during a ship's operations, e.g., water contaminated fuel; emptying bilge, tanks, voids, and other compartments; expired shelf-life materials; boiler layup and

hydroblasting processes. Use this process for RCRA or state regulated wastes that must be manifested because of a ship decommissioning, as well.

U01 – Universal Waste, applicable for new metric in CY05. Any of the following hazardous wastes that are managed under the universal waste requirements of 40 CFR part 273: (1) Batteries as described in 40 CFR 273.2; (2) Pesticides as described in 40 CFR 273.3; (3) Thermostats as described in 40 CFR 273.4; (4) Lamps as described in 40 CFR 273.5; and (5) state-specified universal wastes.

3.6 NAVY SOURCE CODE NO LONGER USED IN CY05

M01 – Munitions and Explosives**.** No longer used in CY05 due to potential discrepancies with the following new source codes for munitions: Munitions that are a hazardous waste, as defined in 40 CFR 260.10 and 266; and, any hazardous waste related to the lifecycle of a munition that has an explosive component. Hazardous waste related to the lifecycle of a munition may be from manufacturing, demilitarization, or recovered from the munitions site-of-use, including any contaminated media from the recovery if it has an explosive component.

APPENDIX A
HW P2ADS DISTRIBUTION LIST

Distribution:
CNI (N45)
COMNAVREG MIDLANT NORFOLK VA (REC)
COMNAVREG NAVAL DISTRICT WASHINGTON DC
COMNAVREG SOUTHEAST JACKSONVILLE FL (N4)
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CG MAGTFTC MCAGCC TWENTY-NINE PALMS CA (Code 9)
CG MCAS CHERRY PT NC (LN)
CG MCB CAMP LEJEUNE NC (EMD)
CG MCB CAMP PENDLETON CA (Code 411, 412, P2MGR)
CG MCB CAMP SMEDLEY D. BUTLER JA (Code 35006ENV)
COMDR MCB QUANTICO VA (B046)
CG MCLB ALBANY GA (A59200)
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CO CBC GULFPORT MS (Code 410)
CO HQBN HQMC HENDERSON HALL (SAFETY)
CO MCAS BEAUFORT SC (NREAO)
CO MCAS IWAKUNI JA (Code 7ENV)
CO MCAS MIRAMAR CA (ENV MGT)
CO MCAS YUMA AZ (ENV)
CO MCB HAWAII (LE, LEC)
CO MCMWTC BRIDGEPORT CA (PW-ENVIR)
CO MCSUPACT KANSAS CITY MO (Recycle, ENV)
CO NAVHOSP BEAUFORT SC (Code 01E)
CO NAVHOSP BREMERTON WA (Code 014E)
CO NRL WASHINGTON DC (Code 3546, 3440)

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CO NAVFAC MIDWEST GREAT LAKES IL (Code 914)
CO ENGFLDACT NORTHEAST PHILADELPHIA PA (ENV12, ENV12/JIM)
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COMFLEACT CHINHAE (N8E)
COMFLEACT OKINAWA JA (N4F/ENV, 50E)
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CO NAS KEFLAVIK IC (Code 6063)
CO NAS KEY WEST FL (N4L)
CO NAS KINGSVILLE TX (Code 00N00, 19600)
CO NAS LEMOORE CA (N45MY, N4L)
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CO NAS PENSACOLA FL (Code 00600)
CO NAS SIGONELLA IT (N49)
CO NAS WHIDBEY ISLAND WA (N44R)
CO NAS WHITING FIELD MILTON FL (Code 18300)
CO NAES LAKEHURST NJ (Code 8.7.4, 82)
CO NAVMAG LUALUALEI HI (N465)
CO NAVPHIBASE LITTLE CREEK VA (Code 940.1)
CO NAVREGCONCEN SINGAPORE (N75)
CO NAVSECGRUACT KUNIA HI (J41)
CO NAVSTA NORFOLK VA (Code 940.1)
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CO NAVSTA GUANTANAMO BAY CU (Code 2051)
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CO NAVSTA NEWPORT RI (N8N)
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CO NAVSTA PEARL HARBOR HI (N465)
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